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RM 8319

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	} RECEIVED
Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations.	**************************************
(Tahoka, Texas)	FCC - MAIL ROOM
To: Chief, Allocations Branch Policy and Rules Division Mass Media Bureau)))

COMMENTS OF PARITY RADIO CORPORATION

- 1. Parity Radio Corporation ("Parity"), a permitte of KZUB(FM) in Tahoka, Texas requests the change in the assignments of Tahoka from Channel 237A to 238C3.
- 2. Parity states that the allocation window permits the use of this channel as is shown in the attached technical exhibit.
- A. The proposed service meets all FCC spacing requirements with modifications of the table proposed.
- B. The entire city of Tahoka, Texas will be served by this proposal.
- C. The proposed changes in Littlefield maintains the same class as assigned with only a 2 kilometer change in coordinates. Because this is a vacant allocation, there will be no permitte or licensee impacted.

- D. The proposed changes for KRVP-FM in Haskell will permit the current operation to continue on the new channel. Parity will pay for all reasonable costs to move KRVP-FM to the new channel.
- 3. The proposal is in the public interest:
- A. The current assignment is a short-spaced grandfathered Class A operating a 3 kW. This will bring the Tahoka assignment to a fully spaced operation under current rules.
- B. The current Class A permit serves 5,824 persons in 1,995 square kilometers within the 60 dBu contour. The proposed operation will serve 134,533 persons in 4,725 square kilometers within the 60 dBu contour.
- 4. Parity will promptly file a FCC Form 301 upon grant of the petition and construct the station on grant of the permit.

Respectfully submitted,

Fried Lungken, President Parity Radio Corporation

110 County Road 213 Cameron, TX 76520

ALLOCATION STATEMENT

This statement is prepared on behalf of Parity Radio Corporation ("KZUB") in Tahoka, Texas, permittee of KZUB, Channel 237A. This is a petition for Rulemaking which requests an amendment of the Table of FM Channel Allotments, Section 73.202(b) of the FCC Rules. The request is to delete Channel 237A in Tahoka and add Channel 238C3. This statement discusses the technical factors involved in the above change.

1. The reference coordinates for this Tahoka, Texas proposal are:

Latitude 33°15'21" North, Longitude 101°50'07" West

- 2. As can be seen from the attached Exhibit A, Class C3 operation from this site will comply with all separation requirements as set forth in \$73.207 of the FCC Rules, except for Channel 238C3 in Littlefield, Texas and Channel 238C1 in Haskell, Texas. These channels will be moved as proposed herein.
- 3. The reference coordinates are located ll kilometers north of the center of Tahoka. From this site the entire city of Tahoka will be served with the 70 dBu contour as required by \$73.315(a) and (b), as demonstrated in Exhibit B.
- 4. KZUB proposes the deletion of Channel 238C3 in Littlefield, Texas and adding Channel 253C3. The reference coordinates for this Littlefield, Texas proposal are:

Latitude 33°55'15" North, Longitude 102°20'57" West
This is a change of 1.7 km from the reference coordinates
listed in the vacant allocation of Littlefield. The allocation
study for Channel 238C3 is shown in Exhibit C.

4. KZUB proposes the deletion of Channel 238Cl in Haskell, Texas and adding Channel 239Cl for KVRP-FM. The reference coordinates for this Haskell, Texas proposal are:

Latitude 33°15'54" North, Longitude 99°55'09" West
This is a change of 15 km from the licensed coordinates. The
allocation study for Channel 238C3 is shown in Exhibit D. The
distance from KZUB C3 to KRVP C1 is 188.6 km. The required
distance to clear is 144 km, a +44.6 km clearnace. A study was
made of the KVRP-FM licensed facility and the results revealed
that KVRP can continue to operate on its current site as a
73.215 short spaced station with no change in its facility of
100 kW and 162 meters on the new channel.



KZUB TAHOKA, TX NARRATIVE

- 5. All site changes proposed herein are beyond the 320 km of the US-Mexican Border and therefore coordination with Mexico will not be required.
- 6. The population served will change from 5,824 persons under the current authorization to 134,533 persons in the proposed 60 dBu (1 mV/m) contour.

I, John R. Furr, I am a Communications Consultant, and represent Parity Radio Corporation. My qualifications are a matter of record with the Federal Communications Commission, and all statements made herein are true and correct to the best of my knowledge and belief.

August 4, 1993

John R. Furr

FM Study for: KZUB FCC Database Date: 6/93 33-15-21
Location: TAHOKA, TX Channel Class: C3 101-50-07
Call City, State Chan Class Freq kW Latitude Dist. Required
Status Proponent File Number HAAT Longitude Azm. Clear (km)

>>>>>> Study For Channel 238 95.5 mHz <<<<<<

KZUB TAHOKA, TX 237 A 95.3 3.00 33-08-15 15.0 89

CP PARITY RADIO CORPORAT BPH-930204JB 100 101-54-48 209.0 -74.0 SHORT

** Use of 73.215 for short spacing requires: 72 -57.0 SHORT

ALLOC LITTLEFIELD, TX 238 C3 95.5 33-56-17 89.2 153

VAC Docket-90-554 0 102-20-38 328.2 -63.8 SHORT

Use of 73.215 for short spacing requires: 142 -52.8 SHORT

Effective 4-26-91

KVRPFM HASKELL, TX 238 C 95.5 100. 33-09-40 188.6 237

CP ROLLING PLAINS BROADC BPH-870129IG 319 99-48-57 92.6 -48.4 SHORT

Use of 73.215 for short spacing requires: 226 -37.4 SHORT

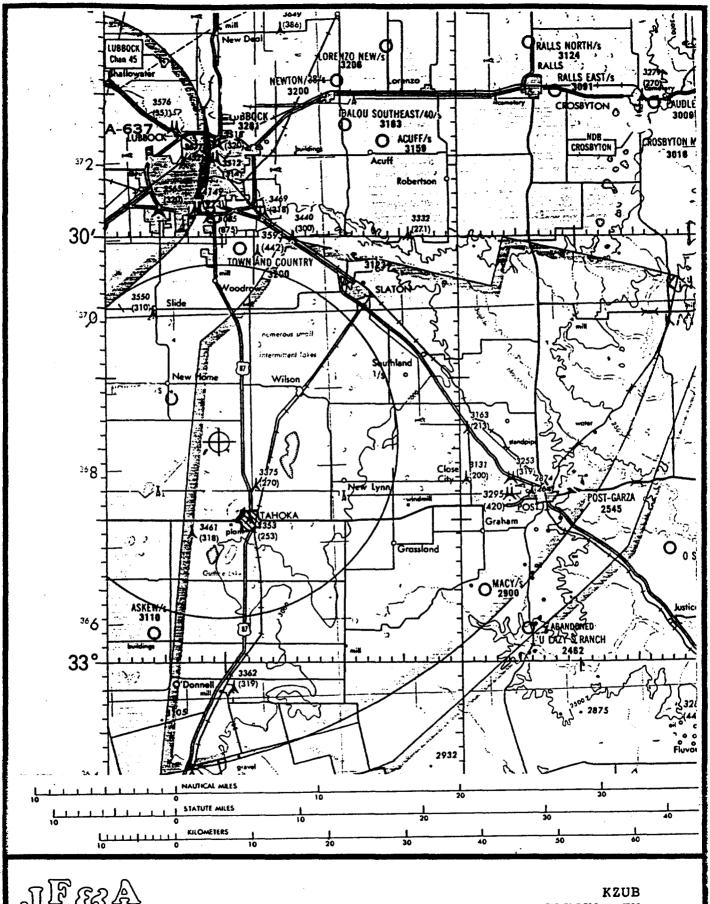
CP Forfeited 910325-Petition For Recon Fld 910426-Petition For Recon & Reinstatement Denied 921127

KVRPFM HASKELL, TX 238 C1 95.5 100. 33-09-40 188.6 211 LIC ROLLING PLAINS BROADC BLH-810416AA 162 99-48-57 92.6 -22.4 SHORT Use of 73.215 for short spacing requires: 200 -11.4 SHORT

KFLL FLOYDADA, TX 237 A 95.3 3.00 33-58-07 90.82 89 LIC ROBERT L. AND CHARLEN Docket-83-938 71 101-21-13 29.4 +1.82 CLOSE

KBSTFM BIG SPRING, TX 237 A 95.3 1.80 32-13-20 119.9 89
LIC DAVID W. WRINKLE BLH-2979 91 101-27-35 162.8 +30.9 CLEAR
*To channel 240C3 Per D90-614
Proposed to mexico as B on 910620

KPER HOBBS, NM 239 C3 95.7 25.0 32-43-28 136.4 99
LIC ARROYO BROADCASTING C BLH-811118AM 78 103-09-03 244.8 +37.4 CLEAR
Class C with respect to Mexico.



JF & A
COMMUNICATIONS
CONSULTANTS

CITY GRADE CONTOUR

TAHOKA, TX EXHIBIT B

FM Sti	on: LITTLEFIELD, TX	FCC Database Date: 6/93 33-55-15 Channel Class: C3 102-20-57
Call	City, State	Chan Class Freq kW Latitude Dist. Required
Status	s Proponent	File Number HAAT Longitude Azm. Clear (km)
	>>>>>> Study For (Channel 253 98.5 mHz <<<<<
KMML	AMARILLO, TX	254 Cl 98.7 100. 35-11-02 144.37 144
		BLH-781010AB 143 101-58-11 13.9 +0.37 CLOS
KICAFI	1 FARWELL, TX	252 A 98.3 6.0 34-23-22 92.1 89
	SOUTHWESTERN BROADCAS nannel 252C2 Per D87-398	BLH-891129KC 78 103-10-27 304.6 +3.1 CLOS 8
KKCL	LORENZO, TX	251 C2 98.1 50. 33-36-32 67.1 56
	AMERICAN GENERAL MEDI CHANNEL 252 PER D86-361	BLH-880520KC 133 101-43-45 120.9 +11.1 CLOS
KCLVF	1 CLOVIS, NM	256 Cl 99.1 74. 34-23-18 92.9 76
		BLH-820923AI 70 103-11-07 304.2 +16.9 CLEX

KMTH MALJAMAR, NM 254 C1 98.7 100. 32-54-55 173.3 144 LIC BD OF REGENTS EASTERN BLED-850225LB 216 103-46-31 230.3 +29.3 CLEAR

RESERVED FOR EDUCATIONAL USE.

	John :	Furr & Associates Inc.	PAGE 1			
FM Stud Locatio	ly for: KVRPFM on: HASKELL, TX Distances rounded to n	FCC Database Date: 6/93 Channel Class: Cl earest kilometer per 73.208(c):	33-15-54 99-55-09			
Call	City, State Ch	an Class Freq kW Latitude Di	ist. Required			
Status	Proponent	File Number HAAT Longitude A	Azm. Clear (km)			
>>>>>> Study For Channel 239 95.7 mHz <<<<<						
KVRPFM	HASKELL, TX	238 C 95.5 100. 33-09-40 1 BPH-870129IG 319 99-48-57 14	15 209			
œ	ROLLING PLAINS BROADC	BPH-870129IG 319 99-48-57 14	40 -194 SHORT			
	Use of 73.215	for short spacing requires: 18	38 -173 SHORT			
CP Forfeited 910325-Petition For Recon Fld 910426-Petition For Recon & Reinstatement Denied 921127						
KVRPFM	HASKELL. TX	238 C1 95.5 100. 33-09-40 1	15 177			
LIC	ROLLING PLAINS BROADC	BLH-810416AA 162 99-48-57 14	40 -162 SHORT			
	Use of 73.215	for short spacing requires: 19	58 -143 SHORT			
KYXSFM	MINERAL WELLS, TX	240 C1 95.9 23.5 32-39-35 13	78 177			
		240 C1 95.9 23.5 32-39-35 17 BPH-920925ID 512 98-09-34 17	12 +1 CLOSE			
From Ch	nannel 240C3 per D90-555					
NEW	WINTERS, TX	240 A 95.9 3.00 32-03-10 13	34 133			
APP	AFM ASSOCIATES, A GEN	-881209MK 100 99-56-26 18	31. +1 CLOSE			
*To amend to channel 241A Per D90-555-Application Returned 890505-ERP/HAAT						
Combination > MAX For Class-Pet For Recon Fld 890612-Must amend to 241A if reinstated per D90-555						
KARX	CLAUDE, TX	239 C1 95.7 100. 35-06-16 25	59 245			
LIC	LUCILLE ANN LACY	239 C1 95.7 100. 35-06-16 25 BLH-920422KB 119 101-39-28 32	22 +14 CLOSE			
KYBE	FREDERICK, OK	240 A 95.9 3.00 34-23-30 1	50 133			
LIC	BRECKENRIDGE BROADCAS	240 A 95.9 3.00 34-23-30 15 BLH-820712AJ 67 99-01-51	33 +17 CLEAR			